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8 Attorneys for Third Party Defendants and
9 Counterclaimants and Fourth Party Plaintiffs
DACA-Castaic, LLC and Debt Acquisition
10 Company of America V, LLC

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13
14 THE RICHARD AND SHEILA J.
McKNIGHT 2000 FAMILY TRUST,
15 Richard McKnight, Trustee

16 Plaintiff

17 v.

18 WILLIAM J. BARKETT, an individual,
CASTAIC III PARTNERS, LLC
19 a California limited liability company

20 Defendants

Case No. 2:10-cv-01617-RCJ

STIPULATION FOR EXTENSION OF
TIME TO FILE AMENDED
OPPOSITION TO APPLICATION FOR
APPROVAL OF SETTLEMENT
PROPOSAL

AND ORDER THEREON

DATE: April 15, 2016

TIME: 10:00 a.m.

COURTROOM: Las Vegas 4B
Hon. Robert C. Jones

21
22
23 AND RELATED INTERVENOR
ACTIONS, THIRD PARTY ACTIONS
24 AND COUNTERCLAIMS

1 This Stipulation by and between Debt Acquisition Company of America V, LLC and DACA-
2 Castaic, LLC (collectively, "DACA"), and William J. Barkett, Castaic Partners, LLC, Castaic
3 Partners II, LLC and Castaic Partners III, LLC (collectively, the "Barkett Parties") and those Direct
4 Lenders represented by Lisa A. Rasmussen as their attorney of record (the "Rasmussen Direct
5 Lenders"), through their undersigned attorneys, is made with reference to the following facts:

6 1. On January 29, 2016, the Barkett Parties filed their Application for Approval of
7 Settlement Proposal and Request for Hearing (ECF No. 413). By minute order entered February 2.
8 2016 (ECF No.418) the Court set the Application w for hearing on February 12, 2016, a date which
9 preceded the time when opposition would normally have been due under the District Local Rules.

10 2. DACA and the Rasmussen Direct Lenders each filed responses to the motion shortly
11 prior to the scheduled hearing. At the hearing, counsel for DACA requested Court permission to file
12 an amended response to the Application which would also address the matters raised by the
13 Rasmussen Direct Lenders' response.

14 3. By minute order entered after the hearing, the Court set the matter for a continued
15 hearing on April 15, 2016, and set March 15, 2016 as the last day for filing DACA's amended
16 response to the Application.

17 4. Counsel for DACA represents to other counsel and to the Court that the March 15
18 deadline (which falls on a Tuesday) is extremely inconvenient as it is the day after counsel for
19 DACA will return from a scheduled vacation, and that reservations for that vacation trip were made
20 in January. Counsel of DACA has requested, and other counsel have agreed, that as a matter of
21 professional courtesy the response deadline should be continued for three days, from Tuesday,
22 March 15 to Friday, March 18.

23 ///

1 WHEREFORE the parties, through their undersigned counsel, stipulate to the entry of an
2 order providing as follows:

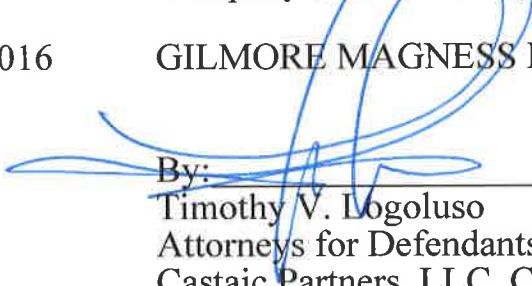
3 1. DACA may file an amended response to the Barkett Parties' Application for
4 Approval of Settlement Proposal (ECF No. 413) on or before Friday, March 18, 2016.

5 SO STIPULATED

6 DATE: February 25, 2016 KIRBY & McGUINN, A P.C.

7 By: /s/ Dean T. Kirby, Jr.
8 Dean T. Kirby, Jr.
9 Attorneys for Third Party Defendants and
10 Counterclaimants and Fourth Party Plaintiffs
DACA-Castaic, LLC and Debt Acquisition
Company of America V, LLC

11 DATE: February 25, 2016 GILMORE MAGNESS LEIFER

12 By: 
13 Timothy V. Logoluso
14 Attorneys for Defendants William J. Barkett,
Castaic Partners, LLC, Castaic Partners II,
LLC and Castaic Partners III, LLC

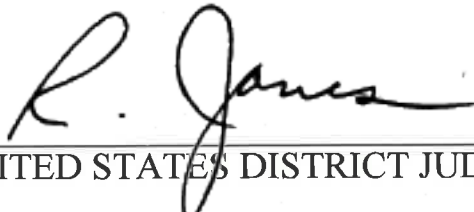
15 DATE: February 25, 2016 LAW OFFICE OF LISA A. RASMUSSEN

16 By: /s/ Lisa A. Rasmussen
17 Lisa A. Rasmussen
18 Counsel for Rasmussen Direct Lenders
19 and Castaic Investors, LLC

20 Upon the above Stipulation,

21 IT IS SO ORDERED.

22 DATE: March 1, 2016.

23 
24 UNITED STATES DISTRICT JUDGE

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE RICHARD AND SHEILA J.
McKNIGHT 2000 FAMILY TRUST,
Richard McKnight, Trustee

Plaintiff

v.

WILLIAM J. BARKETT, an individual,
CASTAIC III PARTNERS, LLC
a California limited liability company

Defendants

AND RELATED INTERVENOR
ACTIONS, THIRD PARTY ACTIONS
AND COUNTERCLAIMS

Case No. 2:10-CV-01617-RCJ

CERTIFICATE OF SERVICE

I, Jacquelyn Wilson, declare under penalty of perjury that the following facts are true and correct: I am a resident of the State of California and over the age of 18 years and not a party to or interested in the above-entitled matter. I am an employee of Kirby & McGuinn, A P.C., and my business address is 707 Broadway, Suite 1750, San Diego, California 92101. On February 9, 2016, I served the following document(s):

- STIPULATION FOR EXTENSION OF TIME TO FILE AMENDED OPPOSITION TO APPLICATION FOR APPROVAL OF SETTLEMENT PROPOSAL

by:

- ☐ MAIL: by placing a true copy(ies) thereof in a sealed envelope(s) in the outgoing mail tray located in my office for deposit in the United States mail, with postage fully prepaid, addressed as shown below. I am readily familiar with the business practice at my place of business for collection and processing of outgoing mail with the U.S. Postal Service that same day in the ordinary course of business.
- ☐ PERSONAL SERVICE: by personally serving by hand delivery in an envelope(s) addressed as shown below:
- ☐ OVERNIGHT DELIVERY: by enclosing, a true copy (ies) in a sealed FedEx envelope(s) addressed as shown below.
- ☐ VIA FACSIMILE: by transmitting via facsimile to the number(s) shown below:
- VIA ECF FILING: by electronically mailing to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

- **Lynn L. Fetterly**
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- 6 • **Richard Segerblom**
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7 I declare under penalty of perjury under the laws of the State of California that
8 the foregoing is true and correct.

9 DATED: February 25, 2016

KIRBY & McGUINN, A P.C.

10
11
12 By: /s/ Jacquelyn Wilson
Jacquelyn Wilson